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Electronically
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by Superior Court of California, County of San Mateo
ON 6/3/2026
By /s/ Owen Tapang
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN MATEO**

JANE DOE 1, an individual,¹

Plaintiff,

vs.

SEQUOIA UNION HIGH SCHOOL
DISTRICT, a public entity; SALVADORA
CALONJE, an individual; and DOES 1 through
50, Inclusive,

Defendants.

Case No.: 26-CIV-04482

COMPLAINT FOR DAMAGES

1. NEGLIGENCE / FAILURE TO PROTECT
2. NEGLIGENT SUPERVISION / FAILURE TO WARN
3. NEGLIGENT HIRING / RETENTION
4. FAILURE TO REPORT SUSPECTED CHILD ABUSE
5. CHILDHOOD SEXUAL ABUSE
6. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
7. SEXUAL HARASSMENT

DEMAND FOR JURY TRIAL

COMES NOW Plaintiff JANE DOE 1 (hereinafter may be referred to as “Plaintiff” or “JANE DOE 1”) who complains and alleges against Defendant SEQUOIA UNION HIGH SCHOOL DISTRICT (hereinafter “SUHSD”), SALVADORA CALONJE (hereinafter “CALONJE”), and DOES 1-50, Inclusive, based on information and belief, as follows:

¹ Due to the nature of the allegations contained herein, Plaintiff, as a victim of childhood sexual abuse, is identified using a pseudonym in order to preserve her confidentiality and privacy pursuant to applicable law, including *Wel. & Inst. Code* § 827; *T.N.G. v. Superior Court* (1971) 4 Cal.3d 767; *People v. Ramirez* (1997) 55 Cal.App.4th 47; *Penal Code* § 293.5; and *Starbucks Corp. v. Superior Court* (2008) 168 Cal.App.4th 1436.

THE PARTIES

1. Plaintiff JANE DOE 1 is an adult female resident of Alameda County, California. Beginning in or around 2006, and at all times relevant to this complaint, Plaintiff was a minor student attending MENLO-ATHERTON HIGH SCHOOL ("MENLO-ATHERTON"), located at 555 Middlefield Road, Atherton, California 94027.

2. While in the care and charge of Defendant SUHSD, Plaintiff was the victim of unlawful childhood sexual assault, abuse, and other misconduct by her high school teacher, CALONJE, which occurred in San Mateo County, California. As a victim of childhood sexual assault and abuse, Plaintiff is entitled to protect her identity in this public court filing by not disclosing her full name.

3. Defendant SUHSD is a public entity providing educational services in San Mateo County, California. At all relevant times, SUHSD was the primary entity owning, operating, maintaining, and controlling MENLO-ATHERTON, where the sexual abuse of Plaintiff occurred.

4. At all relevant times, SUHSD, its agents, servants, and employees maintained, operated, supervised, and controlled MENLO-ATHERTON including, but not limited to, conducting the hiring and staffing for this school. Furthermore, at all relevant times, SUHSD was responsible for monitoring and controlling its teachers' activities and behavior with minor students.

5. At all relevant times, SUHSD employed CALONJE as a teacher at MENLO-ATHERTON. Accordingly, at all relevant times, CALONJE was under the direct supervision, employ, training, management, and control of SUHSD.

6. The true names, identities, or capacities, whether individual, associate, corporate or otherwise, of Defendants DOES 1 through 50 are unknown to Plaintiff who therefore sues said Defendants by such fictitious names, pursuant to Code of Civil Procedure section 474. When the true names, identities or capacities of such fictitiously designated Defendants are ascertained, Plaintiff will ask for leave of Court to amend the complaint to assert the true names, identities and capacities, together with the proper charging allegations.

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1 12. Plaintiff's claims are timely as they have been commenced within the applicable
2 statute of limitations.

3 **EXEMPTION FROM GOVERNMENT TORT CLAIMS ACT**

4 13. Government Code section 905(m) specifically exempts childhood sexual abuse
5 cases from the requirement of filing a government tort claim, as follows:

6 "There shall be presented in ... all claims for money or damages against local public
7 entities except any of the following:

8 ... (m) Claims made pursuant to Section 340.1 of the Code of Civil Procedure for the
9 recovery of damages suffered as a result of childhood sexual assault."

10 14. As such, Plaintiff is not, nor was she, required to present a government tort claim
11 to Defendant SUHSD.

12 **FACTS COMMON TO ALL CAUSES OF ACTION**

13 15. From approximately the 2006–2007 school year through approximately the 2009–
14 2010 school year, Plaintiff was a minor student between the approximate ages of 14 and 18
15 enrolled at MENLO-ATHERTON.

16 16. At all relevant times, CALONJE was employed as a teacher by SUHSD and was
17 acting within the course and scope of her employment.

18 17. By virtue of her employment, CALONJE was tasked with the supervision and care
19 of minor students, including Plaintiff, and was granted unfettered access to those students.

20 18. Due to Plaintiff's status as a minor, she was dependent on the supervision of
21 SUHSD employees. Accordingly, SUHSD and DOES 1-50, Inclusive, and each of them, owed
22 Plaintiff a heightened duty of care to protect her from foreseeable harm and to carry out all
23 mandatory and statutory duties. For example, SUHSD and DOES 1-50s' duties included, but were
24 not limited to:

- 25 a. A duty to take reasonable steps to prevent their agents and employees, including
26 CALONJE, from using the tasks, premises, and instrumentalities of their position
27 with the defendants to groom and to sexually abuse children, including Plaintiff;

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- b. A duty, pursuant to Government Code Sections 815.2(a) & 820, to adequately and properly investigate, hire, and supervise its agents and employees who would be working with minors and students;
- c. A duty, pursuant to Government Code Sections 815.2(a) & 820, to protect the minors and students from harm caused by unfit and dangerous individuals hired as teachers;
- d. A duty to warn, train, and educate the students in its custody, care, and control, like Plaintiff, on known and knowable dangers posed by its faculty and staff pursuant to Government Code Sections 815.2(a) & 820;
- e. A duty to warn, train, and educate its faculty and staff on its sexual harassment policy and inappropriate boundary crossing with students; and,
- f. A duty to use reasonable measures to protect students from foreseeable injury at the hands of third parties acting negligently or intentionally. *C.A. v. William S. Hart Union High School Dist.* (2012) 53 Cal.4th 861, 870.

19. CALONJE, who was then, approximately, in her early thirties, abused her position of authority and trust to groom, sexually harass, and sexually abuse minor Plaintiff.

20. CALONJE's abuse of Plaintiff included but was not limited to: grooming behaviors; sexually inappropriate comments, questions, and discussions; forceful groping, molesting, and fondling; forced digital penetration both of and by CALONJE; forced oral copulation both of and by CALONJE; sexual intercourse; and other inappropriate sexual touching and/or inappropriate sexual misconduct.

21. This inappropriate conduct occurred both on and off campus, including inside CALONJE's classroom, and during and after school hours.

22. Plaintiff is informed and believes that CALONJE engaged in similar sexual misconduct with other students prior to and during the period she abused Plaintiff.

23. Before and during her abuse of Plaintiff, SUHSD had actual and constructive notice of numerous warning signs that their teacher, CALONJE, was likely to use her position with them to groom and sexually abuse the children at MENLO-ATHERTON, including Plaintiff, and that

CALONJE was in fact using her position at MENLO-ATHERTON to groom and sexually abuse Plaintiff. Indeed, much of CALONJE's grooming and sexually harassing behavior took place on school grounds and in CALONJE's classroom. For example, throughout the time that she was sexually abusing Plaintiff, CALONJE would often bring Plaintiff to school in the morning or take Plaintiff home with her after school, in plain sight of other SUHSD administrators, teachers, and staff.

24. Other warning signs that were observable "red flags" included, *inter alia*: CALONJE maintaining isolated and unsupervised contact with minor students in her classroom during and after school hours; CALONJE providing unauthorized transportation to students; and CALONJE engaging in over-familiar communication with minors.

25. Based on the foregoing, SUHSD knew or should have known that CALONJE was unfit and incompetent to serve as a teacher at MENLO-ATHERTON and to otherwise work with children, and that this unfitness and incompetence created a risk of harm to the children enrolled at MENLO-ATHERTON and who participated in its activities, including the risk of sexual assault by CALONJE.

26. Despite knowledge that CALONJE was a danger to the students within its care, that CALONJE had sexually assaulted or was sexually assaulting minor students, and that CALONJE presented a foreseeable risk of sexual assault to minor students, SUHSD failed and/or refused to:

- a. Adequately supervise CALONJE;
- b. Adequately supervise the minor children entrusted to its care, custody, and control, including Plaintiff;
- c. Timely and adequately investigate CALONJE' inappropriate behavior and/or misconduct;
- d. Stop and/or prevent CALONJE's contact with minor children in its care, custody, and control;
- e. Terminate CALONJE's employment;

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- 1 f. Report CALONJE to law enforcement and/or an appropriate investigatory agency,
2 in violation of its mandatory reporting duties under the Child Abuse and Neglect
3 Reporting Act;
- 4 g. Enact or enforce the required child abuse identification and reporting training
5 mandated by Penal Code § 11165.7 and Education Code § 44691;
- 6 h. Provide adequate training to its administrators, employees, staff, volunteers, and
7 youth to detect and report sexual and predatory behavior of adults towards minors;
- 8 i. Implement and/or enforce policies, procedures, and protocols to detect and report
9 suspected child sexual assault and/or abuse, such as prohibiting unsupervised
10 access to children in isolated locations on SUHSD's property; and,
- 11 j. Warn children and their families about CALONJE.

12 27. Proper action, adequate supervision, and/or timely reporting could have prevented
13 some or all of the abuse suffered by Plaintiff.

14 28. With actual and/or constructive knowledge of CALONJE's grooming, sexual
15 harassment, and sexual abuse of Plaintiff and other minor students, SUHSD and DOES 1-50,
16 Inclusive, and each of them, ratified CALONJE's conduct by, among other things, continuing to
17 employ CALONJE in a position of trust with access to minor students; failing to investigate,
18 discipline, or terminate CALONJE; failing to report CALONJE to law enforcement or child
19 protective services; failing to warn Plaintiff, her family, or other students of CALONJE's known
20 propensities; and holding CALONJE out to Plaintiff and her family as a teacher in good standing.
21 By these acts and omissions, SUHSD and DOES 1-50, Inclusive, ratified, adopted, and approved
22 CALONJE's wrongful conduct.

23 29. Thus, SUHSD's wrongful acts and omissions as alleged herein allowed
24 CALONJE's abuse to continue and was the direct and proximate cause of Plaintiff's injuries.

25 30. By reason of the wrongful acts and omissions of SUHSD, Plaintiff has suffered,
26 and continues to suffer, substantial economic and non-economic damages including, but not
27 limited to, significant emotional distress.

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FIRST CAUSE OF ACTION**NEGLIGENCE / FAILURE TO PROTECT****GOVERNMENT CODE §§ 815.2 AND 820****(By Plaintiff Against Defendants SUHSD and DOES 1-50)**

31. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though set forth in full.

32. By virtue of the special relationship between a school and a minor student in its care, custody, and control, Defendants SUHSD and DOES 1-50, Inclusive, and each of them, owed Plaintiff, while she was enrolled at MENLO-ATHERTON, a heightened, non-delegable duty of care to provide and maintain a safe educational environment, to supervise and protect Plaintiff and the other minor students on the school's premises, and to take all reasonable steps to safeguard Plaintiff from foreseeable harm, including the additional duties enumerated in Paragraph 18, subsections a-f, above.

33. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, knew or should have known that CALONJE was unfit and incompetent to serve as a teacher at MENLO-ATHERTON and to otherwise work with children, and that this unfitness and incompetence created a risk of harm to the children enrolled at MENLO-ATHERTON and who participated in its activities, including the risk of sexual assault by CALONJE.

34. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, breached their duty to protect Plaintiff by, among the failures detailed in Paragraph 26, subsections a-j, above, failing to maintain a safe and secure educational environment at MENLO-ATHERTON; failing to adequately supervise the minor students entrusted to their care, including Plaintiff; failing to monitor, secure, and control classrooms, offices, and other areas of the campus, including by permitting classrooms and other spaces to remain unlocked and unmonitored during and after school hours; failing to oversee before-and-after-school student-teacher interactions occurring on school premises; and failing to act upon openly observable red flags witnessed by faculty, staff, security personnel, and other non-supervisory employees who saw CALONJE's grooming and inappropriate conduct toward Plaintiff and other students and did nothing.

38. As a direct and legal result of the wrongful acts and omissions of Defendants SUHSD and DOES 1-50, Inclusive, and each of them, Plaintiff has suffered, and continues to suffer, severe and permanent injuries including, but not limited to, physical and mental pain and suffering, severe emotional distress, past and future costs of medical care and treatment, and other damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

(By Plaintiff Against Defendants SUHSD and DOES 1-50)

40. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, owed a duty to reasonably supervise CALONJE in the course of her employment as a teacher at MENLO-ATHERTON, including a duty to monitor her interactions with minor students, to investigate reports and observations of inappropriate conduct, and to take appropriate corrective action when red flags emerged.

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1 41. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, by and through
2 their administrators, supervisors, teachers, and other employees, knew or in the exercise of
3 reasonable care should have known of CALONJE's dangerous propensities, inappropriate
4 conduct, and pattern of grooming and sexually abusing minor students, including Plaintiff.

5 42. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, breached their
6 duty to supervise CALONJE by failing to investigate, *inter alia*, her known pattern of unauthorized
7 off-campus contact with Plaintiff, as well as her isolated, unsupervised meetings with minor
8 students—including Plaintiff—on school premises during and after school hours, and other openly
9 observable grooming behaviors. Despite this, Defendants failed to take the necessary corrective
10 action to prevent CALONJE from continuing to access and abuse Plaintiff.

11 43. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, further owed a
12 duty to warn Plaintiff, Plaintiff's parents and guardians, other minor students, and the parents and
13 guardians of those other minor students of CALONJE's dangerous propensities and unfitness, of
14 which Defendants knew, or in the exercise of reasonable care, should have known.

15 44. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, breached their
16 duty to warn by failing to warn Plaintiff, her parents and guardians, other minor students, the
17 parents and guardians of those other minor students, law enforcement, or child protective services
18 of CALONJE's dangerous propensities, and by instead holding CALONJE out to Plaintiff and her
19 family as a teacher in good standing, thereby concealing the risk of harm and enabling CALONJE's
20 continued abuse of Plaintiff.

21 45. Had Defendants SUHSD and DOES 1-50, Inclusive, and each of them, properly
22 supervised, monitored, investigated, disciplined, or restricted CALONJE in the course of her
23 employment, and warned of her dangerous propensities, CALONJE would not have had continued
24 unsupervised access to minor students, including Plaintiff, and Plaintiff would not have been
25 subjected to CALONJE's grooming, sexual harassment, and sexual abuse, or would not have been
26 subjected to it to the extent that she was.

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1 46. Pursuant to Government Code §§ 815.2 and 820, Defendants SUHSD and DOES
2 1-50, Inclusive, and each of them, are vicariously liable for injuries to Plaintiff caused by the acts,
3 omissions, and breach of the duty of care of its employees. (*C.A. v. William S. Hart, supra.*)

4 47. As a direct and legal result of the acts and omissions of Defendants SUHSD and
5 DOES 1-50, Inclusive, and each of them, Plaintiff has suffered, and continues to suffer, severe and
6 permanent injuries including, but not limited to, physical and mental pain and suffering, severe
7 emotional distress, past and future costs of medical care and treatment, and other damages, in an
8 amount not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

9 **THIRD CAUSE OF ACTION**

10 **NEGLIGENT HIRING / RETENTION**

11 **GOVERNMENT CODE §§ 815.2 AND 820**

12 **(By Plaintiff Against Defendants SUHSD and DOES 1-50)**

13 48. Plaintiff re-alleges and incorporates herein by reference each and every allegation
14 contained in the preceding paragraphs as though set forth in full.

15 49. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, through their
16 administrators and supervisory employees, had a mandatory duty to adequately investigate, hire,
17 train, and supervise staff and to protect students from harm by unfit and dangerous employees,
18 including CALONJE.

19 50. At all times relevant, SUHSD and DOES 1-50 knew, or in the exercise of
20 reasonable care, should have known of CALONJE's predatory behavior and inappropriate student
21 interactions. Such knowledge rendered CALONJE's future misconduct foreseeable, established
22 her unfitness for continued employment around minors, and mandated her removal or supervision.
23 Despite this, SUHSD and DOES 1-50 continued to employ her in a position of trust.

24 51. SUHSD and DOES 1-50, Inclusive, and each of them, breached these duties by
25 failing to properly supervise, train, oversee, reprimand, prevent, investigate, terminate, monitor,
26 and continuing to employ CALONJE when they knew or should have known that she was a danger
27 to the safety and well-being of the minor students within its care, custody, and control, including
28 Plaintiff.

53. Had Defendants SUHSD and DOES 1-50, Inclusive, and each of them, exercised reasonable care in investigating, hiring, and retaining their teachers, declined to hire CALONJE, and/or terminated CALONJE's employment upon learning of her unfitness, CALONJE would not have had access to Plaintiff, and Plaintiff would not have been subjected to CALONJE's grooming, sexual harassment, and sexual abuse. Defendants' negligent hiring and retention of CALONJE was a substantial factor in causing Plaintiff's injuries.

54. As a direct and legal result of the acts and omissions of Defendants SUHSD and DOES 1-50, Inclusive, and each of them, Plaintiff has suffered, and continues to suffer, severe and permanent injuries including, but not limited to, physical and mental pain and suffering, severe emotional distress, past and future costs of medical care and treatment, and other damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

FOURTH CAUSE OF ACTION

FAILURE TO REPORT SUSPECTED CHILD ABUSE

GOVERNMENT CODE §§ 815.2, 820, PENAL CODE §§ 11165.7(a), 11166(a)

(By Plaintiff Against Defendants SUHSD and DOES 1-50)

55. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though set forth in full.

56. Defendants SUHSD and DOES 1-50, Inclusive, and each of them, through their agents and employees, were mandated reporters under the Child Abuse and Neglect Reporting Act and were required to report known or reasonably suspected incidents of child abuse to law enforcement of child protective services. (Penal Code section 11165, et seq.).

57. As detailed above, Defendants SUHSD and DOES 1-50, Inclusive, and each of them, through their administrators and supervisory employees, while acting within the scope of their employment as mandated reporters, observed objective facts—including CALONJE’s frequent, private, and unauthorized off-campus contact with Plaintiff—that constituted a

1 “reasonable suspicion” of child abuse or grooming under Penal Code section 11166. The failure
2 of these employees to immediately report these observations to a child protective agency
3 constituted a breach of a mandatory, non-discretionary statutory duty.

4 58. Defendants’ failure to comply with their mandatory reporting obligations under the
5 Child Abuse and Neglect Reporting Act constitutes negligence per se under California Evidence
6 Code § 669, in that Defendants violated a statute designed to protect minor students such as
7 Plaintiff from the very type of harm that occurred, and Plaintiff is a member of the class of persons
8 the statute was designed to protect.

9 59. Pursuant to Government Code §§ 815.2 and 820, Defendants SUHSD and DOES
10 1-50, Inclusive, and each of them, are vicariously liable for injuries to Plaintiff caused by the acts,
11 omissions, and breach of the duty of care of its employees. (*C.A. v. William S. Hart, supra.*)

12 60. Had Defendants SUHSD and DOES 1-50, Inclusive, and each of them, complied
13 with their mandatory reporting obligations and timely reported the reasonably suspected abuse and
14 grooming of either Plaintiff or the other minor students who were targeted by CALONJE prior to
15 and during the period she abused Plaintiff, the abuse would have been investigated and stopped.
16 Consequently, CALONJE would have been removed from her position of authority, and the
17 grooming and abuse of Plaintiff would have been entirely avoided. Defendants’ systemic failure
18 to report these mandatory tracking indicators was a substantial factor in causing Plaintiff’s injuries.

19 61. As a direct and legal result of the wrongful acts and omissions of Defendants
20 SUHSD and DOES 1-50, Inclusive, and each of them, Plaintiff has suffered, and continues to
21 suffer, severe and permanent injuries including, but not limited to, physical and mental pain and
22 suffering, severe emotional distress, past and future costs of medical care and treatment, and other
23 damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional limits of
24 this Court.

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FIFTH CAUSE OF ACTION**CHILDHOOD SEXUAL ABUSE****(By Plaintiff Against Defendant CALONJE)**

62. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though set forth in full.

63. Plaintiff was a minor student under the age of 18 when CALONJE, an adult over 18 years of age and acting as her teacher, groomed, sexually harassed, and sexually assaulted Plaintiff. Such grooming and sexual abuse began when Plaintiff was approximately 14 years old and continued through her minority. These acts constitute one or more of the offenses enumerated as "childhood sexual assault" under Code of Civil Procedure § 340.1(d), including, without limitation, lewd or lascivious acts upon a child under the age of 14 in violation of Penal Code § 288; oral copulation with a minor in violation of Penal Code § 287 (formerly § 288a); sexual penetration of a minor in violation of Penal Code § 289; and continuous sexual abuse of a child in violation of Penal Code § 288.5. Each act was committed without Plaintiff's consent, which Plaintiff was legally incapable of giving by reason of her minority.

64. As a direct and legal result of this conduct, Plaintiff has suffered, and continues to suffer, severe and permanent injuries including, but not limited to, physical and mental pain and suffering, severe emotional distress, past and future costs of medical care and treatment, and other damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

65. In committing the acts described herein, CALONJE's conduct was willful, malicious, despicable, and oppressive which justifies an award of punitive damages against CALONJE.

SIXTH CAUSE OF ACTION**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS****(By Plaintiff Against Defendant CALONJE)**

66. Plaintiff re-alleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though set forth in full.

71. In committing the acts described herein, CALONJE's conduct was willful, malicious, despicable, and oppressive which justifies an award of punitive damages against CALONJE.

(By Plaintiff Against Defendant CALONJE)

73. At all relevant times, CALONJE and Plaintiff were in a business, service, or professional relationship within the meaning of Civil Code § 51.9(a)(1), and specifically a teacher-student relationship within § 51.9(a)(1)(F). Plaintiff sought CALONJE's services in her capacity as Plaintiff's teacher at MENLO-ATHERTON.

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74. CALONJE, in the course of a teacher-student relationship, made unwelcome and pervasive sexual advances, solicitations, requests for sexual compliance, and engaged in other verbal, visual, and physical conduct of a sexual nature toward Plaintiff, which was unwelcome and pervasive.

75. Plaintiff, as a minor under CALONJE's care and control, was unable to easily terminate the relationship.

76. As a direct and legal result of this conduct, Plaintiff has suffered, and continues to suffer, severe and permanent injuries including, but not limited to, physical and mental pain and suffering, severe emotional distress, past and future costs of medical care and treatment, and other damages, in an amount not yet ascertained, but which exceed the minimum jurisdictional limits of this Court.

77. Pursuant to Civil Code § 52, Plaintiff also seeks exemplary damages in an amount to be determined by the jury and attorneys' fees against CALONJE.

78. Plaintiff further seeks the statutory civil penalty available under Civil Code § 52(b)(2), reasonable attorneys' fees as provided by Civil Code § 52(b)(3), and any other relief authorized by Civil Code § 52 against CALONJE.

PRAYER FOR DAMAGES

WHEREFORE, Plaintiff JANE DOE 1 prays for judgment against Defendants, and each of them, as follows:

1. For general damages (non-economic) according to proof, including but not limited to past and future physical and mental pain and suffering, severe emotional distress, humiliation, embarrassment, anxiety, and loss of enjoyment of life;

2. For special damages (economic) according to proof, including but not limited to past and future expenses for medical care, psychological treatment, therapy, and counseling;

3. For punitive and exemplary damages against Defendant CALONJE in an amount sufficient to punish her and deter similar conduct;

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4. For treble or other enhanced damages and any additional relief available under Code of Civil Procedure § 340.1, to the extent supported by the proof at trial;

5. For statutory damages, civil penalties, and exemplary damages pursuant to Civil Code § 52, including without limitation the civil penalty authorized by Civil Code § 52(b)(2);

6. For reasonable attorneys' fees pursuant to Civil Code § 52(b)(3) and any other applicable statute;

7. For pre-judgment interest pursuant to Civil Code § 3291 and any other applicable statute;

8. For costs of suit incurred herein; and

9. For such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff JANE DOE 1 hereby demands a jury trial.

DATE: June 3, 2026

LANIER MEYER MCBRIDE BLAIR LLP

By:



MACKENZIE L. JOHNSON

Attorney for PLAINTIFF